

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Brillo Landfill - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region II

Subject: POLREP #3
Complete Setup Activities and Initiate Drum Recovery
Brillo Landfill
A27T
Victory, NY
Latitude: 43.1683611 Longitude: -76.6149088

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From: Mark Gallo, On-Scene Coordinator

Date: 7/11/2018

Reporting Period: June 11 - July 6, 2018

1. Introduction

1.1 Background

Site Number:	A27T	Contract Number:	EP-S2-15-01
D.O. Number:	0047	Action Memo Date:	4/9/2018
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	11/6/2017	Start Date:	10/19/2017
Demob Date:		Completion Date:	
CERCLIS ID:	NYN000203129	RCRIS ID:	NYD980648067
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

CERCLA Removal Action (RV1) at a former non-hazardous waste Landfill.

1.1.2 Site Description

The Site is a former, inactive, non-hazardous waste landfill approximately 113 acres in size which is overgrown and partially wooded with protected wetlands.

During the 1960s, plating waste from General Motors were believed to be disposed on the site on open ground and later covered with soil and seeded. In the 1970s and 80s, the owner operated a permitted non-hazardous, industrial waste landfill which received sewage treatment plant floatables and industrial grinding silica. Sometime prior to 1980, drums of waste were also deposited on site. In the early 1980s, these drums were removed as a condition of obtaining a non-hazardous waste disposal permit from the New York State Department of Environmental Conservation (NYSDEC). The permitted landfill closed in 1986.

During a 2015 NYSDEC remedial investigation sampling event at the Site, approximately 20 drums were uncovered in an area formerly believed to be a drum staging and disposal area. Historical information indicates the waste material may contain PCBs as well as plating wastes. On September 29, 2017 the NYSDEC requested EPA assistance to address the buried drums at the former drum staging and drum disposal areas which covers an approximate area of 0.5 to 0.75 acres.

1.1.2.1 Location

The Brillo Landfill Site is located on the north side of State Route 370, just west of the Village of Cato, Cayuga County, New York.

Latitude 43.168349 Longitude -76.614948

1.1.2.2 Description of Threat

There is a threat to groundwater from the release of wastes within buried drums at the Site. The initial EPA investigation identified several buried drums and drum carcasses in two areas of concern; former drum staging area and the former drum disposal area. Initial screening of several drums were observed to contain liquids which recorded elevated levels of volatile organic compounds (VOCs) (recorded by a photoionization detector) and elevated levels of LEL (Lower Explosive Level). Previous sampling of soil and groundwater by the NYSDEC, in the two areas of concern, has documented VOCs and PCBs to be present.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

In November of 2015, NYSDEC excavated test pits and collected samples at several areas of the 113-acre site. During the NYSDEC remedial investigation, the NYSDEC identified two areas of concern (Drum Staging Area and Drum Disposal Area) in which they uncovered buried drums. Initial screening of those drums reported elevated levels of VOCs. Samples were collected from soil around the buried drums which reported elevated levels of VOCs and PCBs. On September 29, 2017, the NYSDEC referred the two areas of concern to EPA for consideration of a CERCLA Removal Action.

On November 6, 2017, EPA mobilized to the Site with the support of EPA's Emergency and Rapid Response Services Contractor (ERRS) and the EPA's Removal Support Team Contractor (RST) to conduct its initial investigation of the buried drums. On November 7-8, 2017, EPA excavated five former NYSDEC test pit areas which resulted in access to and the sampling of 10 buried drums.

During this initial investigation and sampling event, EPA observed several buried drums and drum carcasses. Drums were observed to have been disposed in a haphazard manner, many partially crushed and/or damaged with few drums in upright positions and many drums laying horizontal and/or at varying degrees from upright position. Drums observed in the former drum staging area were found to be deposited at shallower depths and partially in or below the groundwater zone. Drums observed in the former drum disposal area showed less impacts from groundwater however drums in this area were also observed to be damaged and in varying stages of decay.

Both liquids and solids were sampled from the drums accessed during the initial investigation. Samples collected were submitted to an accredited laboratory for analysis. The requested analysis included the following:

- Target Compound List (TCL) for VOCs
- TCL semi-volatile organic compounds (SVOCs)
- Target Analyte List (TAL) for metals plus mercury, cyanide, and hexavalent chromium
- PCBs, Pesticides, and Herbicides
- Full Toxicity Characteristic Leaching Procedure (TCLP) for RCRA hazardous waste determination (VOCs, SVOCs, Pesticides, Herbicides, PCBs)
- RCRA Characteristics of Ignitability, Corrosivity, and Reactivity
- Target Organic Halide (TOX) analysis

At the completion of assessment and sampling activities, EPA secured or sealed all drums sampled and demarcated areas of known buried drums with orange fencing and/or marked areas with caution tape.

On February 22, 2018, EPA received the final sampling report and validated data from the November 2017 sampling event. EPA conducted a review of the data which reported that the contents from seven of the ten drums samples failed TCLP analysis. Six of the ten samples failed TCLP analysis for Trichloroethene (TCE), with one of those samples also reported as failing TCLP for Tetrachloroethylene (PCE). The 6 samples that failed the TCE TCLP analysis included reported levels from 0.88 mg/L to 2,800,000 mg/L. The RCRA regulatory level for TCE is 0.5 mg/L. The seventh sample failed TCLP analysis for chromium. That sample was reported at 29.3 mg/L and the regulatory level for chromium TCLP is 5.0 mg/L.

The contents from one of the drums samples, and the sample of the surrounding soil reported levels of PCBs exceeding the TSCA regulatory levels. The sample results from the drum contents and surrounding soil were 340 mg/kg (drum liquid) and 1,500 mg/kg (soil). Other hazardous constituents were also reported in the analytical report, but not above the RCRA regulatory levels. Additional hazardous constituents reported include but not limited to; toluene, xylene, ethylbenzene, and nickel.

Following the receipt and review of the analytical data from the November 2017 sampling event, EPA prepared an Action Memorandum to request an increase in funding to continue actions at the Site. The Action Memorandum was approved on April 9, 2018.

2. Current Activities

2.1 Operations Section

June 11-22, 2018

EPA OSC and ERRS mobilized to the Site on 6/11/18 and ERRS initiated clearing and site setup activities. ERRS cleared approximately 1-acre of wooded area that was formerly utilized as a drum staging and disposal area. Cleared areas also included locations along the access road for staging support equipment and an area to east of the former drum disposal area to be utilized as a recovered drum staging area.

During the week of June 18-22, 2018 ERRS completed Site clearing, drum staging area construction, and access road improvements. ERRS continued with the mobilization of equipment and supplies for a planned excavation start date of 6/25-26/18. RST worked on finalizing Site CAMP and QAPP.

The EPA OSC also conducted outreach to nearby residents, the town Supervisor, County Sheriff's Office, and Local Fire Chiefs for the towns of Victory and Cato. As part of the outreach, the OSC discussed the scope of work at the Site and informed local Fire and Law Enforcement of EPA's presence and planned layout of the Site, potential hazards at the Site, and provided EPA contact information for any emergency at the Site.

June 25-29, 2018

RST conducted tests on AreaRAE monitors being utilized as part of the Site CAMP and collected baseline perimeter samples for halogenated VOCs. Following the collection of baseline halogenated VOCs samples ERRS initiated excavation in the northern-most area of the Site, at the former drum staging area, on 6/25/18.

An approximate 75 ft x 90 ft area (former drum staging area) was completed on 6/28/18 with 7 drums and several drum pieces or carcasses recovered in that area. The excavation of the former drum staging area ranged from 4-6 ft below ground surface (bgs). Groundwater was encountered at approximately 5 ft bgs. Prior to backfilling excavated areas, areas were inspected by the EPA OSC and the NYSDEC or NYSDEC on-site contractor. Much of the excavated areas appeared to contain undisturbed native soil with no obvious signs of large areas filled. The recovered drums were pulled from 3 separate locations of the former drum staging areas; one from the northeast area, one drum in the west central area, and five drums from the southwest area.

On 6/28/18 ERRS initiated activities in the northwest area of the former drum disposal area. This area was slightly outside of the previously identified AOC however during silt fence installation the previous week, a drum carcass was uncovered at approximately 12 inches bgs. The decision was made to expand further west to investigate the area further. Fifteen (15) drums and several drum pieces and/or carcasses were recovered from a 10ft x 15ft section in this area. Several of the drums contained liquids which required transfer into new drums. Drums containing solids were removed and overpacked. Where drums contained small quantities of solids, solids were removed and stockpiled on-site and the drum crushed and sent to the drum carcass stockpile. All waste will be sampled, characterized and eventually disposed off-site.

RST conducted work zone and perimeter monitoring. No elevated levels were detected at perimeter air monitoring locations. Work zone monitoring recorded some slightly elevated levels of VOCs and monitoring of some drum contents also reported elevated levels of VOCs using a PID monitor. Although monitoring is conducted in the work zone, regardless of monitoring levels, personnel worked in Level B PPE.

July 2-6, 2018

ERRS continued drum recovery work in the northwest area of the former drum disposal area. An additional 31 drums were recovered during the week bringing the recovered drum total to 53. All the drums recovered were observed partially crushed and significantly deteriorating. Many were observed leaking and the waste recovery included pumping liquid wastes from drums and areas in the excavation. Grossly contaminated soil was also recovered during weekly operations. Approximately 20 cubic yards of soil has been recovered (total) and is being stockpiled on-site. Empty drum carcasses were also recovered, crushed and are being staged on-site. The drum carcass stockpile contains approximately 30 cubic yards of waste.

ERRS initiated hazard characterization of waste in recovered drums and collected samples from drum waste and soil stockpile which were shipped to an accredited laboratory for PCB analysis.

RST continued with work-area and perimeter air monitoring. Perimeter air monitoring did not exceed any of the site-specific action levels. Work-area monitoring was consistent with previous activities, some elevated levels of VOCs were encountered while exposing and recovering buried drums.

RST received preliminary results from baseline air sampling with all samples reported as below method detection levels. The baseline samples were collected on 6/25/18 and submitted to an accredited laboratory and analyzed for halogenated hydrocarbons, NIOSH Method 1003.

2.1.2 Enforcement Activities

EPA continues working with the NYSDEC on possible enforcement actions related to this Site.

On 7/5/18, a drum was recovered which had some limited labeling information. This drum was photographed and logged through the drum tracking process on-site and label information was provided to the regional enforcement staff.

2.2 Planning Section

2.2.1 Planned Activities

- Excavation, recovery, and staging of buried drums
- Sampling and characterization of waste and repackage for off-site disposal
- Off-site disposal of recovered wastes

2.2.2 Issues

None to report at this time

2.3 Logistics Section

Nothing to report at this time

2.4 Finance Section

On September 25, 2017, A verbal authorization of \$100,000 for mitigation funding and \$50,000 for RST contractor funding was provided by the EPA Region 2 Emergency Response and Remediation Division's Acting Division Director to conduct initial actions at the Site. On September 29, 2017, an initial Task Order was issued to the ERRS Contractor for \$100,000.

On April 9, 2018 an Action Memorandum was approved which confirmed the initial verbal authorization for emergency action, authorized a project ceiling increase, authorized a change in scope, and a 12-month exemption. The April 9, 2018 Action Memorandum increased the project ceiling from \$150,000 to \$1,950,000, of which \$1,350,000 is for mitigation contracting.

On May 3, 2018, the EPA OSC added an additional \$60,000 to the RST Site task assignment. This addition increased RST funding to \$110,000 for Site work.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				

ERRS - Cleanup Contractor	\$1,350,000.00	\$146,000.00	\$1,204,000.00	89.19%
RST 3 - Removal Support Team Contractor	\$110,000.00	\$81,000.00	\$29,000.00	26.36%
Intramural Costs				
Total Site Costs	\$1,460,000.00	\$227,000.00	\$1,233,000.00	84.45%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

No information to report at this time

3. Participating Entities

EPA is conducting this action under its CERCLA authority. EPA has been communicating actions with the NYSDEC and will coordinate activities with NYSDEC as necessary. NYSDEC has maintained an on-site presence throughout his reporting period.

4. Personnel On Site

EPA Region 2 OSC	1
EPA ERRS Contractor	3-6
EPA RST 3 Contractor	2
NYSDEC	1
NYSDEC Contractor	1

5. Definition of Terms

None

6. Additional sources of information

Nothing to report at this time

7. Situational Reference Materials

None at this time

BRILLO LANDFILL

Message Sent @ 7/11/2018 12:57:53 PM

Pollution Report #3 Brillo Landfill - Complete Setup Activities and Initiate Drum Recovery

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